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To: **Examiner Roberts P. Culbert**

Fax No.: **703-872-9306**

From: Steven W. Hays

Date: **December 15, 2003**

Our File No.: FGT 1622 PA (199-0868)

Serial No.: 10/057,081

Comments: Attached please find an Affidavit in support of Applicants' Request for Continued Examination which was previously filed with the USPTO on November 26, 2003 concerning the above referenced patent application serial number. Thank you.

Total Pages (incl. Cover sheet): 4

If there are any problems during transmission, please call: (248) 223-9500.

Angie Moscowitz
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In Re Application of:

Fiala, et al.

Serial No.: 10/057,081 Group Art Unit: 1763

Filed: January 25, 2002 Examiner: Roberts P. Culbert

For: SILICON-DOPED AMORPHOUS CARBON COATING FOR PAINT BELL ATOMIZERS

Attorney Docket No.: FGT 1622 PA

I hereby certify that this correspondence is being sent via facsimile to: Mail Stop Non-Fee Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 fax number: (703) 872-9306 on:

December 15, 2003 Angie Moscowitz
Date of Deposit Name of Depositor

Signature of Depositor

AFFIDAVIT UNDER 37 CFR 1.132

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

I, Aaron Fiala being duly sworn, depose and state:

1. I am one of the co-inventors of the following presently presented claims 8-13, 15-22, 24-34, and 56-67of the above-identified patent application.

2. I have been a Supervisor of Process and Automation Engineering at the Dearborn Assembly Plant Paint Department for The Ford Motor Company since April 2003. In this capacity, I supervise 5 salaried employees and 20 hourly operators in all aspects of the paint processing lines. This includes but is not limited to the evaluation, planning, development, purchase, installation, repair, and use of paint application equipment, including paint bell atomizers utilizing aluminum and titanium bell cups. I

believe that I am qualified as an expert in the field of paint automation and process engineering.

3. Prior to my present position, I was a Senior Application and New Technology Development Engineer at The Ford Motor Company. In this capacity, I led a team of 10 engineers in the development, integration, and deployment of an industry leading process of applying Tutone accent colors over wet primers in 2 major paint facilities. I also was the launch engineer for a waterborne paint facility and a co-chair of a solvent reduction program for all U.S. paint facilities at The Ford Motor Company.

4. Since September 1, 2002, I am personally aware of approximately 250 bell cups having a silicon-doped carbon coating made according to the methods as described in paragraph 1 above having been installed throughout Ford Global Technologies, Inc, including a portion at Dearborn Assembly.

5. In my opinion, the aluminum bell cups and titanium bell cups described in paragraph 4 above have achieved unexpectedly superior performance as compared with aluminum bell cups and titanium bell cups previously used on paint application lines within The Ford Motor Company. In fact, as of December 15, 2003, to the best of my knowledge, none of the approximately 250 bell cups described in paragraph 4 wore out or otherwise required replacement. Conversely, bell cups previously used at Dearborn Assembly and throughout The Ford Motor Company required regular replacement after only a few weeks of use. It is estimated that the new bell cups described in paragraph 4 will result in a savings to The Ford Motor Company of between about $1 and 2.7 million per year in terms of equipment costs and repair.

7. The aluminum bell cups and titanium bell cups made in accordance with the methods as described in paragraph 1 above have also achieved commercial success in terms of licensing. As of December 15, 2003, I am personally aware of two such licensing agreements. One of these licensing agreements is between The Ford Motor Company and Diamonex Corporation, while the other licensing agreement is between The Ford Motor Company and Behr Corporation.

8. For reasons supplied in paragraphs 1-7 above and after reviewing the patent application and cited prior art references, it is my opinion that the present invention, as described in claims 8-13, 15-22, 24-34, and 56-67 of the above-identified patent application, is not obvious in view of the cited combination of prior art.

Aaron Fiala

Dated: 12-15-03